

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:  
  
Broadcast Localism

MB Docket No. 04-233

**FURTHER COMMENTS OF BELO CORP.**

Belo Corp. (“Belo”) hereby submits these comments to supplement and update its initial comments of November 1, 2004 in response to the Commission’s Notice of Inquiry in the matter of *Broadcast Localism*.

As indicated in the two Belo News Releases attached hereto, the 2004 election period provided further evidence of Belo’s commitment to serving its communities of license through extensive coverage of local and national politics. In the fourteen weeks leading up to the November general election, Belo stations broadcast 338 hours of candidate debates, news stories, interviews, candidate forums, and other political programming. Thus, Belo’s fourteen news-producing stations aired an average of one hour and forty-three minutes of political coverage per station, per week in the fourteen weeks preceding the November elections. For example, KING-TV and its sister station KONG-TV in Seattle/Tacoma, Washington, aired seven debates, including debates between candidates for the U.S. House of Representatives and Senate, governor, state attorney general, and superintendent for public instruction. To maximize voter awareness and education, Belo television stations re-broadcast their political coverage on sister stations and on the Company’s cable news channels where available, and eight Belo stations posted video of local debates on their websites.

Belo also continued “It’s Your Time,” a program originated by Belo in 1996 that provides free airtime to local candidates to address viewers on issues facing their communities. This year, 159 Congressional and gubernatorial candidates participated in the program, raising the total number of candidates that have participated over the last five election cycles to over 560. Roughly 85 percent of the candidates invited to participate in the program chose to participate, and several stations, including the Belo outlets in Seattle, Portland, Charlotte, New Orleans, Austin, Spokane, and Boise, experienced 100 percent participation by local candidates. Programs such as “It’s Your Time” reflect Belo’s voluntary commitment to serving the communities in which its stations are located and exemplify how broadcasters use local news and informational programming to distinguish themselves from their competition.

The success of Belo's political coverage demonstrates that market forces and journalistic imperatives provide ample incentive for broadcasters to air local news, public affairs, and other community-responsive programming. Therefore, for the reasons discussed herein, as well as those highlighted in its initial comments, Belo urges the Commission to resist adopting any new mandatory quantitative content requirements, formalized ascertainment procedures, or standardized reporting and recordkeeping directives.

Respectfully submitted,

BELO CORP.

By:                     /s/                    

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## News Release

November 16, 2004

### **Belo television stations broadcast more than 300 hours of political coverage during election season**

**Dallas, TX --** Belo Corp. (NYSE: BLC) said today its 14 news-producing television stations broadcast more than 300 hours of political coverage from August 1 through November 2, airing an average of 142 local and national stories each week.

In an effort to better inform and engage its communities in the political process, Belo and its news-producing stations committed this year to broadcast at least an hour of political coverage each week in the six weeks prior to the November 2 general election. The Company and the stations decided to expand coverage of debates, issue and ad-watch programming and interviews with local, state and federal candidates.

Although the goal was to increase coverage beginning six weeks prior to the election, Belo stations expanded their coverage 14 weeks before the election. "The depth of political coverage on Belo's news-producing stations and cable news operations during this election season reflects the Company's commitment to the communities we serve," said Robert W. Decherd, Belo's chairman, president and chief executive officer. "We're very pleased to have provided our communities with this extraordinary level of coverage."

The stations exceeded the goal, broadcasting 338 hours of coverage -- an average of one hour and 43 minutes per station weekly over the 14-week period. The coverage included 21 debates that gave viewers a focused look at the candidates and their platforms. KING-TV and its sister station, KONG-TV, in Seattle/Tacoma were especially active, broadcasting three congressional debates, a senatorial debate, a gubernatorial debate, an attorney general debate and a debate between candidates vying for the post of Superintendent for Public Instruction.

To maximize voter education, Belo television stations re-broadcast their political coverage on sister stations and on the Company's cable news channels, where available. Belo's two regional cable news operations and its four local cable news channels televised an average of 176 stories weekly, representing an average of four hours and 36 minutes of political coverage each week. In another outreach effort, eight Belo television stations posted video of local debates online.

This unprecedented political coverage was in addition to more than 20 hours of free airtime Belo stations provided to congressional and gubernatorial candidates this election season as part of the Company's "It's Your Time" program. Belo pioneered "It's Your Time" in 1996 to help viewers better understand the issues facing their communities. This year, 159 candidates in Belo markets participated in the program. More than 560 candidates have participated in "It's Your Time" over the last five election cycles.

#### **About Belo**

Belo is one of the nation's largest media companies with a diversified group of market-leading television, newspaper, cable and interactive media assets. A *Fortune* 1000 company with approximately 7,600 employees and \$1.4 billion in annual revenues, Belo operates media franchises in some of America's most dynamic markets and regions, including Texas, the Northwest, the Southwest, Rhode Island, and the Mid-Atlantic. Belo owns 19 television stations (six in the top 15 markets); owns or operates seven cable news channels; and manages one television station through a local marketing agreement. Belo's daily newspapers are *The Dallas Morning News*, *The Providence Journal*, *The Press-Enterprise* (Riverside, CA) and the *Denton Record-Chronicle* (Denton, TX). Belo operates more than 30 Web sites, several interactive alliances and a broad range of Internet-based products. Additional information, including earnings releases, is available online at [www.belo.com](http://www.belo.com). For more information, contact Carey Hendrickson, vice president/Investor Relations & Corporate Communications, at 214-977-6626.



## News Release

November 4, 2004

### **159 congressional, gubernatorial candidates participate in Belo program that offers candidates free airtime**

**Dallas, TX --** Belo Corp. (NYSE: BLC) said today that 159 congressional and gubernatorial candidates across the country participated in the Company's fifth consecutive "It's Your Time" program, offering them free airtime during the 2004 election cycle to inform voters about their candidacies.

Belo television stations in each of the Company's 15 markets produced more than 20 hours of "It's Your Time" programming from September 21 to Tuesday -- four minutes for each candidate to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. Belo maximized the impact of "It's Your Time" by re-broadcasting the programming on the Company's two regional cable stations and several of its local cable news channels. In addition, Belo offered all of the programming to Public Broadcasting Service stations in the Company's markets.

Belo originated "It's Your Time" in 1996 as a public service dedicated to helping viewers in the Company's markets nationwide gain a better understanding of the issues facing their communities. "It's Your Time" was the first instance of a commercial television station group offering free airtime for congressional and gubernatorial candidates. Since Belo's introduction of this unprecedented program, other broadcasting companies have joined the Company's effort to offer free-airtime in their respective markets.

Of the 188 eligible candidates in Belo's television markets, 159 elected to participate in "It's Your Time" -- a greater than 50 percent increase from the 104 congressional and gubernatorial candidates who participated during the 2002 election cycle. Since the program's inception, Belo has provided free airtime to more than 560 candidates.

"Our political coverage demonstrates Belo's continued commitment to creating an informed electorate in the communities we serve," said Robert W. Decherd, Belo's chairman, president and chief executive officer. "Belo's voluntary effort achieves the goals of giving viewers robust, local political coverage without a government mandate."

Following is a breakdown of "It's Your Time" coverage:

<b>News Producing Station</b>	<b>Market</b>	<b>"It's Your Time" # of candidates who were invited</b>	<b>"It's Your Time" # of candidates who participated</b>
WFAA-TV (ABC)	Dallas/Fort Worth	21	18
KHOU-TV (CBS)	Houston	17	13
KING-TV (NBC)	Seattle/Tacoma	18	18
KTVK-TV (Ind.)	Phoenix	12	7
KMOV-TV (CBS)	St. Louis	18	14
KGW-TV (NBC)	Portland	14	14
WCNC-TV (NBC)	Charlotte	18	18
KENS-TV (CBS)	San Antonio	8	7
WVEC-TV (ABC)	Hampton/Norfolk	9	6
WWL-TV (CBS)	New Orleans	11	11
WHAS-TV (ABC)	Louisville	14	8
KVUE-TV (ABC)	Austin	6	6
KREM-TV (CBS)	Spokane	11	11
KTVB-TV (NBC)	Boise	5	5

KMSB-TV (FOX)	Tucson	6	3
Total		188	159

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